

Content-Type: multipart/signed; protocol="application/x-pkcs7-signature";
micalg=SHA1; boundary="-----_NextPart_000_009B_01D1BFFB.6849F970"

-----_NextPart_000_009B_01D1BFFB.6849F970

Content-Type: text/plain;
charset="us-ascii"
Content-Transfer-Encoding: 7bit

Hi Lily,

Thank you for the information.

The Navy is putting together a couple brief paragraphs in response to NBC's request to us. We were not able to make NBC's deadline of Wednesday for phone interview.

I will send over the our statements, once they are ready to go.

I would change this the second paragraph statement "... EPA and its state regulatory agency partners (the California Department of Public Health and the California Department of Toxic Substances Control) oversee and enforce..."

- to -

"... EPA and its state regulatory agency partners (the California Department of Public Health and the California Department of Toxic Substances Control) ensure that Navy selected remedies are protective of human health and the environment and comply with applicable and relevant requirements..."

Derek

-----Original Message-----

From: LEE, LILY [mailto:LEE.LILY@EPA.GOV]

Sent: Friday, June 03, 2016 4:26 PM

To: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO; Janda, Danielle L CIV; Edwards, Zachary L CIV SEA 04 04N; Slack, Matthew L CIV SEA 04 04N; Bacey, Juanita@DTSC; Tina Low (TLow@waterboards.ca.gov); Franklin, William D CIV NAVFAC HQ, BRAC PMO; Brownell, Amy (DPH); Drew, Tamsen (ADM)

Subject: [Non-DoD Source] Hunters Point radiation cleanup statement to reporter

A reporter from NBC news has asked EPA about radiation cleanup at the Hunters Point Naval Shipyard. EPA referred her to the Navy as the lead on the cleanup at Hunters Point. My press officer also sent this statement today to her about EPA's role overseeing Navy cleanup and EPA's process in developing risk based approaches to evaluate cleanup completeness. I wanted to share it with you as well. Our press office offered to talk with her after she reviews it provide any clarification needed.

- Lily

The Hunters Point Naval Shipyard (HPNS) is a former military base in San Francisco, California. It was used by the Navy as a naval submarine and ship repair facility from 1945 until 1974 and was also the site of the Naval Radiological Defense Laboratory from 1948 to 1969. In 1989, U.S. EPA placed the Shipyard on its National Priorities List, which is a list of federal Superfund sites in the United States.

The Navy is the lead agency responsible for the investigation and cleanup of HPNS. As part of the process, EPA and its state regulatory agency partners (the California Department of Public Health and the California Department of Toxic Substances Control) oversee and enforce Navy compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (commonly called the Superfund law) to ensure the cleanup at HPNS protects human health and the environment. The Navy and regulatory agencies work together to decide how to address the contamination. The Navy also gathers community input through a public process.

EPA uses the best available science to develop guidance for cleaning up sites, such as HPNS, that are contaminated with radioactive materials. EPA's goal for the HPNS cleanup is to ensure that the community is protected from exposure to radiation and that the site can be used for work, recreation, and residential purposes.

EPA assesses the health effects of radiation at a site by calculating the "excess cancer risk" posed by radioactive contamination. Excess cancer risk is the additional probability that a person exposed to contamination will develop cancer over a lifetime. Superfund regulations in the National Contingency Plan have defined the protective range of excess cancer risk as a probability that a person exposed to radioactive and chemical contaminants will have between an additional one in ten thousand and a one in a million chance of developing cancer (technically known as the 10⁻⁴ to 10⁻⁶ cancer risk range). When calculating this range, EPA uses assumptions about exposure that are higher than people's actual exposure. This means that EPA overestimates risk to make sure that cleanups are sufficiently protective.

EPA reviews the Navy's cleanup report for each survey unit (small area of land or part of a building) of HPNS using the current version of the EPA risk model to make sure that radiation levels are within the protective 10⁻⁴ to 10⁻⁶ cancer risk range. This ensures that any land that is transferred to the City of San Francisco for new use meets appropriate levels for protectiveness with regard to radiation. To provide additional protection, the Navy is installing a protective cover over the whole site. The Navy is also developing a plan, which EPA will review, that ensures the Navy or City will maintain and inspect the cover indefinitely.

EPA's risk models have changed over time as radiation science continues to improve. EPA has incorporated the latest models into its review process to ensure the HPNS cleanup continues to be protective of human health and the environment. EPA has reviewed the Navy's past HPNS cleanup reports, applying the current EPA risk model, and found that the Navy's earlier work had achieved the cleanup level needed to protect human health and the environment.

University of California at Santa Cruz Presentation

On April 21, 2016, a small group of faculty and students from the University of California at Santa Cruz gave a presentation about the HPNS cleanup at an Environmental Justice Task Force Meeting held in the Bayview-Hunters Point neighborhood. The presentation had some inaccuracies and left out some relevant information, as noted below.

The presentation criticized EPA's reliance on 2006 cleanup standards.

. In fact, EPA uses the latest version of EPA's risk model to review each Navy radiation cleanup report for individual sections of the site as they are drafted. ("Latest version" refers to whichever version is current at the time that EPA reviews each report.)

The presentation suggested that the Navy should be using standards with exposure scenarios that reflected only one end of the range that EPA considers protective.

. In fact, the Navy and EPA assessments of cleanup needs are already based on scenario assumptions of exposure that are higher than would be realistic. In part, this is because the assumptions of exposure do not take into account the protective cover. In addition, EPA considers the protective range to refer to a probability that a person exposed to radioactive and chemical contaminants will have between one in ten thousand and one in a million greater chance of developing cancer. The presentation did not reflect this complete range. Finally, the Navy routinely cleans up radiation to levels within the protective range, even with the current version of worst case scenario assumptions.

The presentation criticized the fact that the Navy's documents reference several different cleanup requirements.

. In fact, Navy cleanup documents showed requirements from multiple agencies that might apply to particular cleanups. The Navy must meet requirements specific to each of those agencies - including the most strict. Some of the standards that the Navy must meet may be less strict than EPA's, but the Navy still referenced them in the documents to show that by complying with stricter standards, they also meet other requirements. The final cleanup requirements were selected in several Records of Decision that were presented in a series of public meetings, allowed at least 30 days for public comment, and then finalized.

-----=_NextPart_000_009B_01D1BFFB.6849F970

Content-Type: application/pkcs7-signature; name="smime.p7s"

Content-Transfer-Encoding: base64

Content-Disposition: attachment; filename="smime.p7s"

MIAGCSqGSib3DQEHAqCAMIACAQExCzAJBgUrDgMCGGUAMIAGCSqGSib3DQEHAQAAoIISjTCCA3
Aw
ggJYoAMCAQICAQUwDQYJKoZIhvcNAQEFBQAwwZELMAkGA1UEBhMCVVMxGDAWBgNVBAoTD1U
uUy4g
R292ZXJubWVudDEMMAoGA1UECXMdRG9EMQwwCgYDVQQLEwNQS0kxJFjAUBgNVBAMTDURvRC
BSb290
IENBIDlwHhcNMDQxMjEzMTUwMDEwWWhcNMjEzMTUwMDEwWjBbMQswCQYDVQQGEwJVUzEY
MBYG
A1UEChMPVS5TLiBhb3Zlcm5tZW50MQwwCgYDVQQLEwNEb0QxDDAKBgNVBAStA1BLSTEWMBQG
A1UE
AxMNRG9EIFJvb3QgQ0EgMjCCASlwDQYJKoZIhvcNAQEBBQADggEPADCCAQoCggEBAMAswfaNO6
z/
PzzWcb64dCIH7HBBFfyrQOMHqsHD2J/+2kw6vz/l2Ch7SzYBwKxFJcPSDgqPhRhkED0aE3Aqb47X
3l2Ts0EPOCHNrvCPSoF01cRNw3NjFH5k+PMRkkjhS0zcsUPjjNcjHuqxLyZeo0LlZd/+5jdctt
upE0/J7z9C0cvIDEQt9ZiP9qs/qobD3LVnFxBZa7n4DlGvZZ0Gw68OtYKSAAdQYXnA70Q+CZDhv7
f/WzzLKBgrH9MsG4vkGkZLVgOlPRLIzO3kEsGUdcSRBkuXSph0Gvfw66wbihv2UxOgRn+bW7jpKK

AGO4seaMOF+D/1DVO6Jda7IQzGMCaWEAAaM/MD0wHQYDVR0OBBYEFEl0uwxeunr+AITve6DGlcYJ
gHCWMAAsGA1UdDwQEAWIbhjAPBgNVHRMBAf8EBTADAQH/MA0GCSqGSIb3DQEBBQUAA4IBAQC
kY0/
ici79cBpcyk7Nay6swh2PXAjkumERCEBfRR2G+5RbB2NFTctezFp9JpEuK9GzDT6I8sDJxnSgyF1
K+fgG5km3IRAlcio0sz2WFxm7z9KlxCCHboKot1bBiudp2RO6y4BNaS0PxOtVeTVc6hpmxHxmPlx
Hm9A1Ph4n46RoG9wBJBmqgYrzuF6krV94eDRluehOi3MsZ0fBUTth5nTTRpwOcEEDOV+2fGv1yAO
8SJ6JaRzmcw/pAcnlqiile2CuRbTnguHwsHyiPVi32jfx7xpUe2xXNxUVcKpCTmarAPB2wxNrm8K
ehZJ8b+R0jiU0/aVLLdsyUK2jccQjYXZMIIEuDCCA6CgAwIBAgIDQpJOMA0GCSqGSIb3DQEBBQUA
MF0xCzAJBgNVBAYTAIVTMRgwFgYDVQQKEw9VLIulEdvdmVybm1lbnQxDDAKBgNVBAsTA0RvRDE
M
MAoGA1UECXMdUEtJMRgwFgYDVQQDEw9ET0QgRU1BSUwgQ0EtMjkWwHhcNMTMwODE2MDAwMD
AwWhcN
MTYwODE1MjM1OTU5WjB5MQswCQYDVQQGEwJVUzEYMBYGA1UEChMPVS5TLiBHb3Zlcm5tZW50
MQww
CgYDVQQLEwNEb0QxDDAKBgNVBAsTA1BLSTEMMAoGA1UECXMdVVNOMSYwJAYDVQQDEx1ST0
JTTINP
Ti5ERVJFSy5KT04uMTI4OTY2MDY1NDCCASlwDQYJKoZIhvcNAQEBBQADggEPADCCAQoCggEBAJ
ZG
tMScJ7YBMzlu3v+YKn3M7nmzRyL6n4+SoAnKo/zRBjHbtivEGUIEWb8KmBGTbB/qjrKlt9kyRQra
7gzzmCwT2MM9JK8DKVUHcEtCNbr2Cr8VzUNyv4LFSyXc6SOMBEo5oUaJAVSHobGo4zKPR8ogiYJ
LXw0NyGCAo8CZIM/8lutifUKiYk7mj+6XNUbRkNAZymJStfmoF9PnN+m7aLPe0EvU6YjoKlrWt
h1zAzB3hfykkFCZ7tc3JYgmbwowpv9D2PMGrPfy9iw77RoCOTUoDLPlril7mbYbYZzBBtBV9yx6P
3ZCJiAEG7t0J1YGEol8CjGMG8QBS3h8ujM0CAWEAAaOCAWMwggFfMB8GA1UdIwQYMBaAFLhDg2Q
h
eu5wgd6l3gXgKld4rl54MDoGA1UdHwQzMDEwL6AtoCuGKWh0dHA6Ly9jcmwuZGlzYS5taWwvY3Js
L0RPREVNQUIMQ0FfMjkuY3JsMA4GA1UdDwEB/wQEAWIFIDAJBgNVHSAEHDAaMAAsGCWCGSAFIAG
EL
CTALBgIghkgBZQIBCxMwHQYDVR0OBBYEFKupKbbwzGqWQ+SI9+mFIGNIDWdMMGgGCCsGAQUF
BwEB
BFwwWjA2BggrBgEFBQcwAoYqaHR0cDovL2NybC5kaXNhLm1pbC9zaWduL0RPREVNQUIMQ0FfMjku
Y2VyMCAGCCsGAQUFBzABhhRodHRwOi8vb2NzcC5kaXNhLm1pbDAIBgNVHREEHjAcgRpkZXJlay5q
LnJvYmLuc29uMUBuYXZ5Lm1pbDABBgNVHQKEFDASMBAGCCsGAQUFBwKEMQQTAVTMA0GCSqG
SIb3
DQEBBQUAA4IBAQBrdwwBUpwhoORjMlpS2v7cfOJc2scqM7Xpw7CEZhIUCkYN9paMyWe5PA0y1A9
h1m0jNG2DhaLnf3b/S4LLBZwqQPnCslezeTXg+V+78y+5gvJtigFAvqAKbFVoLIEyR4BYRMRmCcs
ku+rt80esFooJjWzN2g7WafJFBvETJh346P9SL99RU9BREPOyKyBQRqcOFSBwGFtdJYR7B4CFhA+
dKyVeguOg3Cp5SPjPHwnnwRgblZNgP3RYGuBM64bqsEQ8deB5LPV8/kosTy/SfIKUZULHfAFLADQ
e1qTnBSLYNwu9fXR0fE0LrW48WxHi11iWgTqa7qz3StQksDas0ItMIIFAZCCA+ugAwIBAgIDQpJM
MA0GCSqGSIb3DQEBBQUAMF0xCzAJBgNVBAYTAIVTMRgwFgYDVQQKEw9VLIulEdvdmVybm1lbn
Qx
DDAKBgNVBAsTA0RvRDEMMAoGA1UECXMdUEtJMRgwFgYDVQQDEw9ET0QgRU1BSUwgQ0EtMjkWwHhcN
wHhcN
MTMwODE2MDAwMDAwWhcNMTYwODE1MjM1OTU5WjB5MQswCQYDVQQGEwJVUzEYMBYGA1UEChMPVS5T
ChMPVS5T
LiBHb3Zlcm5tZW50MQwwCgYDVQQLEwNEb0QxDDAKBgNVBAsTA1BLSTEMMAoGA1UECXMdVVNO
MSYw
JAYDVQQDEx1ST0JTTINPTi5ERVJFSy5KT04uMTI4OTY2MDY1NDCCASlwDQYJKoZIhvcNAQEBBQA
D
ggEPADCCAQoCggEBAM884TfhLhbhOUK7EZbFvZQ1rBFgE70hTXwyjSoONlqZEYQgbdVMiy/ZY94J
uiJ7PSCqXdvli4WeqTPyTiTXjD0GF7UjeCMMOnc8g2KcicNWw2/kDYEfdoSJZp6Kz/wW2wnpSZo
2PBEYsk1pnrSbhMP1DWCnqpwmY4LfrghP9J0MTEhSg3LRqoogDIS2NBj7KEry9OQyuh2l5m9XP
k42sWMb5896qwZgHsHYISxocWij68yXlq9ArSZ/EvjdrECq1/oThRaANK5lbfhscMn/U1ilnCRsO
jL3CVZYi1G3AwYRWB/k5jXjkUd9JXUoscfi2zsjp92oekZfJ/vdN+kkCAWEAAaOCAa4wggGqMB8G
A1UdIwQYMBaAFLhDg2Qheu5wgd6l3gXgKld4rl54MDoGA1UdHwQzMDEwL6AtoCuGKWh0dHA6Ly9j
cmwuZGlzYS5taWwvY3JsL0RPREVNQUIMQ0FfMjkuY3JsMA4GA1UdDwEB/wQEAWIGwDAJBgNVHSA
E

HDAaMAsGCWCGSAFIAGELCTALBglghkgBZQIBCxMwHQYDVR0OBByEFITRq8iwZECsGAbtMGJWRg
WH
8y7JMGgGCCsGAQUFBwEBBFwwWjA2BggrBgEFBQcwAoYqaHR0cDovL2Nybc5kaXNhLm1pbC9zaW
du
L0RPREVNQUIMQ0FfMjkuY2VyMCAGCCsGAQUFBzABhhRodHRwOi8vb2NzcC5kaXNhLm1pbDBFBGn
V
HREEPjA8gRpkZXJlay5qLnJvYmluc29uMUBuYXZ5Lm1pbKAeBgorBgEEAYI3FAIDoBAMDJEyODk2
NjA2NTRAbWlsMBsGA1UdCQQUMBIwEAYIKwYBBQUHCCQxBBMCMVVMwKQYDVR0IBClwIAYKKwYB
BAGC
NxQCAgYIKwYBBQUHAWIGCCsGAQUFBwMEMA0GCSqGSib3DQEBBQUAA4IBAQAqio0QZaNVTA3P
yahD
NIUA6jblCujlH0nT42t8clmZwS0W+ZJ1Sz9T/ePVhGtCkBur0ANFGdpfZ/0N5Nff0QgYek6gUisD
U0aCELrct2PEhL6tzLnRtMuuv735bgxRrwwx8jiPwy6mtdYNB0PSme5T8QwUOjirlxpwdfNDY0pe
Nygel8+mxznDHViCzoRmwdzQ53WpFJf0xGhzWGPdW6/0HxzjdDq9ZYvdjQ0mXn4/WmGrYw8/UqVF
R9u+qL2s4T29zFHkfakh/NSC0VgN9phoOqkS8OcaBw6FeC3tG7Gx8//cMZFaEBEDIKUfjtcQ5Ocq
t8dOVaiFfLEB6xJKvAX6MIIFUjCCBDqgAwIBAGlCABgwDQYJKoZlhcNAQEFBQAwWzELMAkGA1UE
BhMCMVVMxGDAWBgNVBAoTD1UuUy4gR292ZXJubWVudDEMMAoGA1UECxmDRG9EMQwwCgYDV
QCLEwNQ
S0kxFjAUBgNVBAMTDURvRCBSb290IENBIDlwHhcNMTEwOTA4MTYwMjE0WhcNMTCwOTA4MTYwMj
E0
WjBdMQswCQYDVQQGEwJVUzEYMBYGA1UEChMPVS5TLiBHb3Zlcm5tZW50MQwwCgYDVQQLEwN
Eb0Qx
DDAKBgNVBAStA1BLSTEYMBYGA1UEAxMPRE9EIEVNQUIMIENBLTI5MIIBljANBgkqhkiG9w0BAQEF
AAOCAQ8AMIIBCGKCAQEAkmlvQclgABYGVWSfvaelfW6Cm0jBhXe9AqsM2ferYIEBuj51cl4Spqc4
hJCz6UCAEtxqylHNrS2GEMxEvA7FWDgZshQyJUFUWFxDDshscw/DDBgYFgSaUj2BonHOPDIAn3FV
uvjONNcelbcolOc9Pqb2wHoxYJEol3ciUPLGk26yG8VBxvmhN/sQv9pWpvtSTV+/78SWdyjIMv/o
4RjMQ1IYrl13mnJM6J0DXrCi7+Td0ufmp6ZSreGYCJZKQ8xzPUuijYnv3lJMuEqAJGUrHpGC9QT2
ch9XGEAX8DIRto/ziTtn91hOSrza+Q7BwAy98whx+IMPYs6AlfSFDs6uqQIDAQABo4ICHDDCAhgw
DgYDVR0PAQH/BAQDAgGGMB8GA1UdlwQYMBaAFeI0uwxunr+AITve6DGlcYJgHCWMB0GA1UdDg
QW
BBS4Q4NklXrucIHepd4MYCiHeK5eeDASBgNVHRMBAf8ECDAGAQH/AgEAMAwGA1UdJAAQFMAOAAQ
Aw
ZgYDVR0gBF8wXTALBglghkgBZQIBCwUwCwYJYIZIAWUACAQsJMAsgCWCGSAFIAGeLETALBglghkg
B
ZQIBCxlwCwYJYIZIAWUACAQsTMAwGCmCGSAFIAGwIBAxowDAYKYIZIAWUDAgEDGzA3BgNVHR8EM
DAu
MCygKqAohiZodHRwOi8vY3JsLmRpc2EubWlsL2Nybc9ET0RST09UQ0EyLmNybcDCCAQEGCCsGAQU
F
BwEBBIH0MIHxMDoGCCsGAQUFBzACHi5odHRwOi8vY3JsLmRpc2EubWlsL2lzc3VIZHRvL0RPRFJP
T1RDQTJfSVQucDdjMCAGCCsGAQUFBzABhhRodHRwOi8vb2NzcC5kaXNhLm1pbDCBkAYIKwYBBQ
UH
MAKGgYNsZGFwOi8vY3JsLmdkcy5kaXNhLm1pbC9jbiUzZERvRCUyMFJvb3QIMjBDQSUYMDIIMmNv
dSUzZFBLSUyY291JTNkRG9EJTJjbyUzZFUuUy4IMjBHb3Zlcm5tZW50JTJjYyUzZFVTP2Nybc3Nz
Q2VydGlmaWNhdGVQYWlyO2JpbmFyeTANBgkqhkiG9w0BAQUFAAOCAQEALGsseTXb8B4ch3ur4ehp
ajeL23pPVWBpIS9TncbKQ7bUN5HWA11+Wrg4HfeegdOuUFQwpG9LLrsUGxeqXBDTIHoxOZakVHn1
6VYuVcMbFuqqAsjPUfcygSLGNDqzZqqSJPH6fseMn5xxHbwrVQSHVXqvVwyhzquk5pumSJfqFE1
7rJTYF/2T0W4FoQdZVXNFcoQAR+p0pynV5Gj1+ewhj0t9Ik62MI3cFDGbO/y65j4EKo92shcKa3O
uHNJTKGSu+btzbqCGmMhGWX0Bhm/g6pz5dMbsZj/Rd/7Scxz6OLnB5YAMel/2SQI58pEekgGwOLY
P/I5h6U3khaphCCSYzGCAzlwggMuAgEBMGQwXTELMakGA1UEBhMCMVVMxGDAWBgNVBAoTD1UuU
y4g
R292ZXJubWVudDEMMAoGA1UECxmDRG9EMQwwCgYDVQQLEwNQs0kxGDAWBgNVBAMTD0RPR
CBFTUFJ
TCBDQS0yOQIDQpJMMakGBSsOAwwlaBQCgggGjMBgGCSqGSib3DQEJAzELBgkqhkiG9w0BBwEwHA
YJ
KoZlhcNAQkFMQ8XDTE2MDYwNjllwNTc0N1owlwYJKoZlhcNAQkEMRYEFOgs0+w68SoHL4DPX3oK
cSblj7hMFgGCSqGSib3DQEJDzFLMEkwCgYIKoZlhcNAwCwDgYIKoZlhcNAwICAgCAMAcGBSsO

AwIHMA0GCCqGSib3DQMCAgEoMAcGBSsOAwlaMAoGCCqGSib3DQIFMHMGCSsGAQQBgjcQBDF
mMGQw
XTELMakGA1UEBhMCVVMxGDAWBgNVBAoTD1UuUy4gR292ZXJubWVudDEMMAoGA1UECzMDRG
9EMQww
CgYDVQQLEwNQs0kxGDAWBgNVBAMTD0RPRCBFTUFJTCBDQS0yOQIDQpJOMHUGCyqGSib3DQ
EJEAIL
MWagZDBdMQswCQYDVQQGEwJVUzEYMBYGA1UEChMPVS5TLiBHb3Zlcm5tZW50MQwwCgYDVQ
QLEwNE
b0QxDDAKBgNVBAsTA1BLSTEYMBYGA1UEAxMPRE9EIEVNQUIMIENBLTI5AgNCkk4wDQYJKoZIhvc
N
AQEBBQAEggEAhE2Vw0Behf+YZ/T9ua8PfmY0spNgD/zRi2xWWOWBZDWOKoQ3/7zSfzpPG4xihMjN
EJJBxkaUb26W7ap/V5llrZ7j5pJr8ee5XEFo0G5Hz1bgOpFh8glpmge/1FIOiErOu++5MdjA0FX
AKOtZDU5RRFeIRug4gQ4TV3WUjP0YyAMV72NwsztnsjL5o12RTddaF+5W60IZ0A886ddLof2td23
o5LPr6yK7OYq12HXq2DnHuJ9WxLoSOldGDZPQrNuD6mEslv167nsoXzzu2uKXzAOoSYr0al5pZeW
Sbz8Bu2UNSCnLOUxHA5irEvgimbWlqsSy7NU7R//mFjilsRLdQAAAAAAAAA==

-----_NextPart_000_009B_01D1BFFB.6849F970--